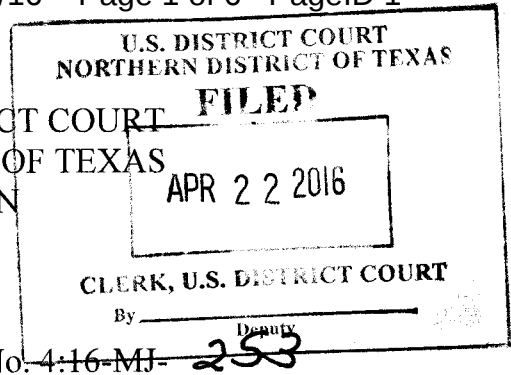


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

MANDY MARIE TURNER  
a/k/a/ "Amy WOOLDRIDGE" (01)

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance  
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2015, and continuing until on or about April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant, **Mandy Marie TURNER**, also known as Amy Wooldridge, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of Homeland Security Investigations (HSI) for approximately nine years. I received basic investigative instruction at the Federal Law Enforcement Training Center in Glynco, Georgia, and additional continuing instruction regarding investigative techniques.

I am currently assigned to the HIDTA group of the Dallas office of HSI, working with investigators and officers from several agencies including the Drug Enforcement Administration and Fort Worth Police Department.

2. As a law enforcement officer, I have participated in several investigations of unlawful narcotics smuggling and distribution. I have participated in wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy.

Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that Shawn Douglas CROPP, Stephanie Ann HATLEY, **Mandy Marie TURNER**, along with others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, Shawn Douglas Cropp, Stephanie Ann HATLEY, and **Mandy Marie TURNER** along with others agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among Shawn Douglas Cropp, Stephanie Ann HATLEY, and **Mandy Marie TURNER** along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On March 17, 2015, agents/officers with Homeland Security and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at XXXX Cotton Wood Dr., Benbrook, Texas, and arrested Gavin Seguin.
- b. Arrest of Shanda Hawkins, on March 27, 2015, on an outstanding Federal Arrest Warrant.
- c. On the night of July 25-26, 2015, Fort Worth police officers seized approximately 3.5 grams of methamphetamine from **Mandy TURNER**.
- d. On August 7, 2015, agents/officers from the Irving Police Department and the United States Marshal's Service arrested Matthew RUTLEDGE on an outstanding Federal Arrest Warrant.
- e. Arrest of Shawn Douglas CROPP and Stephanie Ann HATLEY on December 15, 2015, by the Fort Worth Police Department and the seizure of approximately \$11,344.00 U.S. Currency, 32.5 grams of methamphetamine, and drug paraphernalia.
- f. Arrest of Shawn Douglas CROPP and Stephanie Ann HATLEY on January 20, 2016 by the Fort Worth Police Department and the seizure of approximately 555 grams of methamphetamine.

12. In a custodial interview on the night of July 25-26, 2015, **TURNER** stated she and Brian GIBBONS had previously obtained six ounces of methamphetamine from Matthew RUTLEDGE and transported the drugs to a customer in Oklahoma.

**TURNER** also identified J.N as a kilogram-quantity methamphetamine source of supply.

13. TURNER was arrested, for possessing approximately 14 ounces of methamphetamine, by an officer of the Howe, Texas Police Department on September 21, 2015. In a custodial interview on September 22, 2015, **TURNER** stated she introduced CROPP, as a methamphetamine customer, to J.N. **TURNER** also stated she provided ten ounces of J.N.'s methamphetamine to CROPP on or about September 10, 2015.

14. Cooperating Defendant-1 (CD1) identified Shawn Douglas CROPP as a methamphetamine distributor whom she (CD1) had witnessed receive eight (8) ounces of methamphetamine and twenty (20) ounces of GHB from another co-conspirator in July 2015. Additionally, CD1 said that she (CD1) witnessed CROPP pay four thousand five hundred dollars (\$4,500) for the narcotics. Cooperating Defendant-2 (CD2) confirmed that CROPP was involved in distributing methamphetamine. Specifically, CD2 said that on at least ten (10) occasions in 2015 he (CD2) and CROPP put their money together to purchase kilogram quantities of methamphetamine. On January 20, 2016, Shawn Douglas CROPP and Stephanie Ann HATLEY were arrested by the Fort Worth Police Department in possession of approximately 555 grams of methamphetamine.

15. On December 15, 2015, officers with the Fort Worth Police Department arrested Shawn Douglas CROPP and Stephanie Ann HATLEY in possession of approximately \$11,344.00 U.S. currency, 32.5 grams of methamphetamine, and drug paraphernalia.

On January 20, 2016, officers with the Fort Worth Police Department arrested Shawn Douglas CROPP and Stephanie Ann HATLEY in possession of approximately 555 grams of methamphetamine.

21. Based on the foregoing, the Complainant believes that probable cause exists that **Mandy Marie TURNER** along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Mike McCurdy  
Special Agent  
Homeland Security Investigations

SWORN AND SUBSCRIBED before me, at 9:51 am/pm, this 22<sup>nd</sup> day of  
April, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON  
United States Magistrate Judge